



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

Division File: Compliance

144970

MAR 19 1992

REPLY TO THE ATTENTION OF:

HRE-8J

J.L. Gary, General Manager  
Chemical Waste Management  
Trade Waste Incinerator Division  
7 Mobile Avenue  
Sauget, Illinois 62201-1069

1631210009 H. Clair  
Re: Off-Site Policy Determination  
Trade Waste Incineration (CWM)  
ILD 098 642 424

RCRA - Part B.

Dear Mr. Gary:

On February 7, 1992, the United States Environmental Protection Agency (U.S. EPA) sent Trade Waste Incineration (TWI) a notification of continued unacceptability pursuant to the November 13, 1987, off-site policy. In the February 7, 1992, letter, U.S. EPA stated that TWI failed to demonstrate that it had returned to full physical compliance with its Resource Conservation and Recovery Act of 1976, as amended, (RCRA) Part B permit. This determination was based on U.S. EPA's review of the weekly activity reports sent by TWI to the State of Illinois as required by a previous Consent Decree, People v. Chemical Waste Management, No. 90-MR-34, dated February 16, 1990 (1990 Consent Decree). The weekly activity reports detail incinerator upset conditions and equipment failure events.

Enclosed please find summary Tables that specify the violations of the RCRA Part B permit and their frequency based on TWI's weekly activity reports. These violations represent a significant deviation from permit conditions and are therefore considered Class 1, relevant violations under the off-site policy directive (Revised Procedures for Planning and Implementing Off-site Response Actions, OSWER Directive No. 9834.11, November 13, 1987).

As a criterion for return to acceptability, the off-site policy directive states that there must be no relevant violations at the affected receiving unit.

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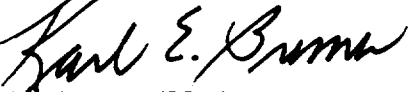
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Due to the continuing relevant violations for each of the four units at TWI, U.S. EPA has determined that the TWI facility is still not acceptable for the receipt of waste under the off-site policy.

Sincerely yours,

*for* 

David A. Ullrich, Director  
Waste Management Division

Enclosures

cc: William Child, IEPA  
William Ingersoll, IEPA  
~~William Radlinski, IEPA~~  
Bharat Mathur, IEPA  
Doug Clay, IEPA  
Mike Grant, IEPA, Collinsville Office  
Edward Kenney, CWM

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# Attachment 1

## Frequency of Excursions from the Permit Operating Conditions as Reported in Weekly Upset Condition Reports from Trade Waste Incineration

### Incinerator # 1

Permit Operating Conditions	Dates					
	12/23- 30/91	12/30- 1/6/92	1/6- 13/92	1/13- 20/92	1/20- 27/92	1/27- 2/3/92
O <sub>2</sub> > 9% by vol.	13	47	19	17	3	6
CO < 500ppm	13	31	11	15	11	11
CO < 50ppm(3min)	13	45	18	16	10	15
Hydrocarbon	5	12	6	1	1	1

### Incinerator # 2

Permit Operating Conditions	Dates					
	12/23- 30/91	12/30- 1/6/92	1/6- 13/92	1/13- 20/92	1/20- 27/92	1/27- 2/3/92
O <sub>2</sub> > 5% by vol.	409	497	407	167	955	1026
CO < 500ppm	55	45	38	39	28	42
CO < 50ppm(60 min)	55	55	39	39	28	48
Hydrocarbon < 85ppm	0	0	0	0	4	0

### Incinerator # 3

Permit Operating Conditions	Dates					
	12/23- 30/91	12/30- 1/6/92	1/6- 13/92	1/13- 20/92	1/20- 27/92	1/27- 2/3/92
O <sub>2</sub> > 6% by vol.	2543	3143	1365	1295	782	1081
CO < 400ppm	18	30	9	7	11	13
CO < 50ppm(3 min)	40	55	18	17	20	24
Hydrocarbon < 85ppm	0	5	1	1	4	2

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Attachment 1 continued

Incinerator # 4

Permit Operating Conditions	Dates					
	12/23- 30/91	12/30- 1/6/92	1/6- 13/92	1/13- 20/92	1/20- 27/92	1/27- 2/3/92
O <sub>2</sub> > 6.4% by vol.	49	132	18	128	114	*
CO < 400ppm	4	11	18	12	4	*
CO < 50ppm (3 min)	22	22	11	22	8	*
Hydrocarbon < 85ppm	0	0	0	0	0	*

\* Missing Data Report